

BEUTLER LAW
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**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH**

IN RE:

Sonia Pacheco

Debtor

Case No. 24-24105

Chapter 13 Bankruptcy

Honorable Joel T. Marker

**NOTICE OF ADEQUATE PROTECTION PAYMENTS UNDER 11 U.S.C. § 1326(a)
AND OPPORTUNITY TO OBJECT**

The Debtor state as follows:

1. The Debtor filed a Chapter 13 petition for relief on August 14, 2024.
2. The Debtor propose to make Adequate Protection Payments, pursuant to § 1326(a)(1)(C) accruing with the initial plan payment which is due no later than the originally scheduled meeting of creditors under § 341 and continuing to accrue on the first day of each month thereafter, to the holders of the allowed secured claims in the amounts specified below:

| Secured Creditor | Description of Collateral | Monthly Adequate Protection Payment Amount | Number of Months to Pay Adequate Protection |
|------------------|---------------------------|--|---|
| USTC | All Personal Property | \$32.00 | 8 |
| | | | |
| | | | |
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3. The monthly plan payments proposed by the Debtor shall include the amount necessary to pay all Adequate Protection Payments and the amount necessary to pay the Trustee's statutory fee.
4. Upon completion of the Adequate Protection Payment period designated herein for each listed secured creditor, the Equal Monthly Plan Payment identified in each Part of the Plan shall be the monthly payment and shall accrue on the first day of each month.
5. This Notice shall govern Adequate Protection Payments to each listed secured creditor unless subsequent Notice is filed by Debtor or otherwise ordered by the Court.
6. Objections, if any, to the proposed Adequate Protection Payments shall be filed as objections to confirmation of the Plan. Objections must be filed and served no later than 7 days before the date set for the hearing on confirmation of the Plan.

Dated: August 26, 2024

/s/ Derek Beutler
Derek Beutler
Counsel for the Debtor

CERTIFICATE OF SERVICE BY MAIL OR OTHER MEANS

I hereby certify that on **August 26, 2024**, I caused to be served a true and correct copy of the foregoing **NOTICE OF ADEQUATE PROTECTION PAYMENTS UNDER 11 U.S.C. § 1326(a) AND OPPORTUNITY TO OBJECT** as follows:

☐ **Mail Service: First-class U.S. mail, postage pre-paid, addressed to:**

☐ **Mail Service to All Parties in Interest: First-class U.S. mail, postage pre-paid, addressed to all parties who did not receive electronic service as set forth herein listed on the Official Court Mailing Matrix dated August 26, 2024 attached hereto.**

☒ **Certified Mail Service – By certified United States mail, postage pre-paid, addressed to:**

**Utah State Tax Commission
210 N 1950 W
SLC, UT 84134**

☐ **Hand Delivery – By delivery to the following parties at:**

☒ **Other – [identify parties served and manner of service]:**

**Lon Jenkins
Chapter 13 Trustee (ECF)**

**US Trustee (ECF)
Ustregion19.sk.ecf@usdoj.gov**

DATED this August 26, 2024

**/s/ Jennelle Burrows
Paralegal to
Derek Beutler
Counsel for the Debtor**